

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING DIVISION**

**SCOTT SONDA and
BRIAN CORWIN**

Plaintiffs,

VS.

CIVIL ACTION NO 5:22-cv-124

**WEST VIRGINIA OIL & GAS
CONSERVATION COMMISSION, et al.**

Defendant.

**PLAINTIFFS' RESPONSE TO DEFENDANT OIL & GAS CONSERVATION
COMMISSION'S MOTION TO DISMISS**

NOW COME, the Plaintiffs, Scott Sonda and Brian Corwin, by and through their Counsel, the Law Office of Edmond & Baum, PLLC, to present their Response to Defendant Oil & Gas Conversation Commission's Motion to Dismiss. In said motion, Defendant asserts the case should be dismissed pursuant to Federal Rule of Civil Procedure 12(b)(1) on the ground, as asserted in said Motion, that Plaintiffs have not alleged any actual or impending injury resulting from the law' application. Accordingly, the Plaintiffs respond by stating Plaintiffs have adequately alleged actual or impending injury resulting from the law's application, and therefore Plaintiffs do indeed have standing to prosecute this matter. In support of this response and the assertions made herein, Plaintiffs have supplied a Memorandum in Support of this Response accompanying this response.

Respectfully Submitted,
Scott Sonda and Brian Corwin

By:

/s/ J. Anthony Edmond Jr.

Michael B. Baum, Esq. (WVSB #12310)

J. Anthony Edmond Jr. Esq. (WVSB
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CERTIFICATE OF SERVICE

I, J. Anthony Edmond Jr., do hereby certify that on this 16th day of November,
20 22, I electronically filed a true and exact copy of the forgoing with the Clerk of Court and
all parties using the CM/ECF System.

/s/ J. Anthony Edmond Jr.

J. Anthony Edmond, Jr., Esq.